

**BY ECF**

February 28, 2008

Honorable Leonard B. Sand  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1650  
New York, NY 10007

RE: United States v. Padilla-Parra et al  
07 Cr. 1168 (LBS)

Dear Judge Sand:

Please be advised that we foresee our plea negotiations beyond February 28, 2008.

In view that the parties are seeking to resolve the matter without litigation, the defense does not intend now to file pre-trial motions, although, we are going to reserve the right to pre-trial motions if we cannot negotiate a plea.

This letter will also confirm that Barry Deonarine, Esquire will appear on my behalf at the status conference scheduled for March 13, 2008 at 10:30 a.m.

Very truly yours,

EDWARD J. ABRAMSON, Esq.

EJA/mmfm

cc: AUSA Parvin Moyne  
Barry Deonarine, Esq.  
Mr. Antonio Padilla-Parra